

ORIGINAL

FILED IN CHAMBERS
U.S.D.C. Atlanta

MAY 14 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

UNITED STATES OF AMERICA

v.

TRAVIS SENTALL ROBINSON,
a.k.a. "Triggaplay," a.k.a. "Trigga,"
and
LADRIGUS DONDREA STUCKEY,
a.k.a. "Dreek."

Criminal Indictment

No. **1:14CR0176**

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on a date unknown to the grand jury, but at least by in or about August 2013, and continuing until at least in or about April 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," did combine, conspire, confederate, agree, and have a tacit understanding to knowingly and willfully recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, J.R., D.A. and M.M., a minor under the age of 18 years, knowing and in reckless disregard of the fact that M.M. had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing and in reckless disregard of the fact

that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause J.R., D.A. and M.M. to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1).

OVERVIEW OF THE CONSPIRACY

The defendants committed numerous acts as part of the conspiracy, including, but not limited to, those described below:

1. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," caused J.R., D.A. and M.M. to engage in commercial sex acts for the defendants' financial gain.
2. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," used electronic devices, including cellular telephones and computers, to post photographs of J.R., D.A. and M.M. in escort and erotic classified advertisement sections of Internet websites such as Backpage.com for the purpose of causing J.R., D.A. and M.M. to engage in commercial sex acts.
3. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," transported J.R., D.A. and M.M. to various states for the purpose of causing J.R., D.A. and M.M. to engage in commercial sex acts.

4. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," utilized various hotels involved in interstate commerce in the Atlanta, Georgia area and elsewhere to cause J.R., D.A. and M.M. to engage in commercial sex acts.

5. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," used a cellular telephone to maintain contact with J.R., D.A. and M.M. at the time that he and defendant Ladrigus Dondrea Stuckey, a.k.a. "Dreek" caused J.R., D.A. and M.M. to engage in commercial sex acts.

6. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," committed acts of violence against J.R. and D.A., who the defendants caused to engage in commercial sex acts.

7. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," committed acts of violence against M.M., the minor who defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," caused to engage in commercial sex acts.

8. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," required that J.R., D.A. and M.M. give him the proceeds of the commercial sex acts in which the defendants caused them to engage.

All in violation of Title 18, United States Code, Sections 1594(c), 1591(b)(1) and 1591(b)(2).

COUNT TWO

Beginning on a date unknown, but at least by in or about December 2013, and continuing until on or about January 20, 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, M.M., a minor under the age of 18 years, knowing and in reckless disregard of the fact that M.M. had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause M.M. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a), (b)(1) and (b)(2), and Section 2.

COUNT THREE

Beginning on a date unknown, but at least by in or about December 2013, and continuing until on or about January 20, 2014, in the Northern District of

Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly transport M.M., an individual who had not attained the age of 18 years, in interstate commerce with the intent that M.M. engage in prostitution, in violation of Title 18, United States Code, Section 2423(a) and Section 2.

COUNT FOUR

Beginning on a date unknown, but at least by in or about August 2013, and continuing until in or about April 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," aided and abetted by one another, and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, J.R, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause J.R. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT FIVE

Beginning on a date unknown, but at least by in or about March 2014, and continuing until in or about April 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," aided and abetted by one another, and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, D.A., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause D.A. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

FORFEITURE PROVISION

As a result of committing the offenses set forth in Counts One through Five of this Indictment, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all

property, real and personal, constituting or derived from proceeds traceable to the offenses, including, but not limited to, a sum of money equal to the value of the proceeds of said offenses.

Additionally, as a result of committing one or more of the offenses alleged in Counts One, Two, Four, and Five of this Indictment, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga" and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1594(d) and (e), all property, real and personal, constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used or intended to be used in any manner or part to commit or facilitate the commission of said offenses, including, but not limited to, a sum of money equal to the value of the proceeds of said offenses and a sum of money equal to the value of all facilitating property.

Additionally, as a result of committing the offense alleged in Count Three, the defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428 all property, real and personal, constituting or derived from proceeds the defendant obtained directly or indirectly as a result of said violation, and any

and all property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the

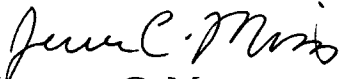
forfeitable property described above.

A True BILL
Payle Payle
FOREPERSON

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